

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re SADIA, S.A.
SECURITIES LITIGATION

Case No. 1:08-CV-09528 (SAS)

**NOTICE OF CLASS REPRESENTATIVES' MOTION
FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND PLAN OF ALLOCATION**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Preliminarily Approving Proposed Settlement dated September 23, 2011, and upon the Joint Declaration of Christopher L. Nelson and Joseph E. White, III in Support of Final Approval of Settlement and Plan of Allocation, as well as an Application for an Award of Attorneys' Fees and Expenses and Reimbursement to the Class Representatives, and all other papers and proceedings herein, certified Class Representatives Westchester Putnam Heavy & Highway Laborers Local 60 Benefit Funds, Alan Hyman, Phil Carey, Steve Geist and Peter Schicker will and do hereby move this Court on December 22, 2011, at 2:30 p.m. in the Courtroom of the Honorable Shira A. Scheindlin, United States District Judge for the Southern District of New York, United States Courthouse, 500 Pearl Street, New York, New York 10007, or other such location and time as set by the Court, for entry of a Judgment approving the Settlement as fair, reasonable and adequate and for entry of an Order approving the proposed Plan of Allocation as fair and reasonable.

Dated: November 17, 2011

Respectfully submitted,

LAW OFFICES OF CURTIS V. TRINKO, LLP

/s/ Curtis V. Trinko

Curtis V. Trinko (CT-1838)
Jennifer Traystman (JT-7583)
16 West 46th Street, 7th Floor
New York, NY 10036
T: (212) 490-9550
F: (212) 986-0158

Local Counsel for Plaintiffs and the Class

KESSLER TOPAZ MELTZER
& CHECK, LLP
Stuart L. Berman
Christopher L. Nelson
John J. Gross
Jennifer L. Enck
280 King of Prussia Road
Radnor, PA 19087
Tel: (610) 667-7706
Fax: (610) 667-7075

SAXENA WHITE P.A.
Maya Saxena
Joseph E. White III
Christopher S. Jones (CJ-4131)
Brandon T. Grzandziel
2424 North Federal Highway
Suite 257
Boca Raton, FL 33431
Tel: (561) 394-3399
Fax: (561) 394-3082

Co-Lead Counsel for Plaintiffs and the Class

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the November 17, 2011, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all registered users.

/s/ Curtis V. Trinko
Curtis V. Trinko